

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**IN RE:**

**JOHN ANDREW GOODMAN**

DEBTOR

**အသံအသံ**

**CASE NO. 24-10806**

## CHAPTER 7

**DEBTOR'S MOTION FOR ENLARGEMENT OF TIME IN WHICH  
TO FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

**AN ORDER WILL BE ENTERED GRANTING THE RELIEF REQUESTED HEREIN WITHOUT FURTHER HEARING UNLESS A WRITTEN OBJECTION AND REQUEST FOR HEARING IS FILED WITH THE CLERK WITHIN TWENTY-ONE (21) DAYS OF THE DATE OF ISSUANCE OF THIS NOTICE. ANY SUCH OBJECTION MUST ALSO BE SERVED UPON THE MOVING PARTY AND UPON ALL OTHER PERSONS INDICATED ON THE CERTIFICATE OF SERVICE ATTACHED TO THIS PLEADING.**

**TO THE HONORABLE SHAD ROBINSON, U.S. BANKRUPTCY JUDGE:**

John Andrew Goodman, Debtor, respectfully represents:

1. The Debtor filed an emergency petition for relief under Chapter 7 of the Bankruptcy Code on July 10, 2024, without the full set of schedules and statement of financial affairs. The case was filed on an expedited basis due to numerous pending lawsuits.
2. Pursuant to Rule 1007(a) and (c) of the Bankruptcy Rules of Procedure, the debtor's schedules are due to be filed within fourteen days after the filing date which in this case is July 24, 2024.
3. The Debtor's counsel will be on vacation in California starting July 11, 2024 and will return on July 19, 2024, and will be in the process of counseling with the Debtor to prepare the Debtor's schedules and statement of financial affairs.
4. Due to the lack of time to fully prepare this case for filing prepetition, the schedules and statement of financial affairs were not filed with the petition. Due to

time constraints of counsel and the Debtor, who live in different cities and counsel's vacation, they have not had sufficient time to meet and to complete the required documents and materials described above. Counsel will be unavailable to confer with the Debtor during most of his vacation. The Debtor and counsel need through August 10, 2024 to accomplish the required document preparation and filing.

5. Counsel has not completed the analysis of the Debtor's financial records to document the Debtor's assets and transfers, if any, to creditors which should be included in the statement of financial affairs.

6. The Debtor requests an enlargement of time in which to complete its schedules and statement of financial affairs, pursuant to Rule 1007 of the Bankruptcy Rules of Procedure through August 10, 2024.

7. A §341 meeting has been scheduled in this case for August 15, 2024.

8. The enlargement of time requested is in the best interest of the Debtor's estate and of its creditors.

WHEREFORE, PREMISES CONSIDERED, the Debtor prays as aforesaid.

Dated: July 10, 2024.

Respectfully submitted,

LAW OFFICES OF MARTIN SEIDLER  
One Elm Place, Suite E-504  
11107 Wurzbach Road  
San Antonio, Texas 78230  
Tel: (210) 694-0300  
Fax: (210) 690-9886  
Email: [marty@seidlerlaw.com](mailto:marty@seidlerlaw.com)

By: /s/ Martin Seidler  
Martin Seidler, #18000800  
ATTORNEY FOR DEBTOR

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was served on all parties authorized to receive notice through the ECF notice system and/or on the attached matrix for this case on this 10<sup>th</sup> day of July, 2024.

/s/ Martin Seidler  
Martin Seidler

Label Matrix for local noticing  
0542-1  
Case 24-10806-smr  
Western District of Texas  
Austin  
Wed Jul 10 18:08:23 CDT 2024

18920 NW 11th LLC  
c/o Joseph W. Golinkin, II  
1980 Post Oak #2300  
Houston, TX 77056-3841

Alliance Texas Holdings, LLC  
c/o Michael A. Cancienne  
1980 Post Oak #2300  
Houston, TX 77056-3841

Auerbach Partners, LP  
c/o Michael A. Cancienne  
1980 Post Oak #2300  
Houston, TX 77056-3841

Capital One Auto Finance  
P. O Box 259407  
Plano, TX 75025-9407

Christopher Murray, Trustee  
DeBauche OSP Comm., LLC  
602 Sawyer St. #400  
Houston, TX 77007-7510

Credit One Bank  
P O Box 98872  
Las Vegas, NV 89193-8872

Dist Clerk #23-09-14382  
P. O. Box 2985  
Conroe, TX 77305-2985

(p)BANK OF AMERICA  
PO BOX 982238  
EL PASO TX 79998-2238

Frinzi Family Trust  
c/o Paul Thomas Elkins  
100 Throckmorton St. #1500  
Ft. Worth, TX 76102-2845

United States Trustee (SMG17)  
United States Trustee  
903 San Jacinto Blvd, Suite 230  
Austin, TX 78701-2450

AMR Resources, LLC  
110 Allgood Indus. Ct.  
Marietta, GA 30066

Amarillo National Bank  
c/o Clint R. Latham  
P. O. Box 1  
Amarillo, TX 79105-0001

Bank of America  
P. O. Box 17237  
Wilmington, DE 19886-0001

Carrington Coleman  
901 Main St. #5500  
Dallas, TX 75202-3767

Citibank  
P O Box 6217  
Sioux Falls, SD 57117-6217

DeBauche OSP Communications, LLC  
P. O. Box 2371  
Fredericksburg, TX 78624-1921

Dist. Clerk #111762 BCV  
501 S. Fillmore St.  
Amarillo, TX 79101-2433

FedEx Supply Chain Logistics &  
Electronics, Inc./Adam Langley  
P. O. Box 171443  
Memphis, TX 38187-1443

GNET ATC, LLC  
2801 Network Blvd #300  
Frisco, TX 75034-1881

U.S. BANKRUPTCY COURT  
903 SAN JACINTO, SUITE 322  
AUSTIN, TX 78701-2450

Alicia Lackey/Cayenne Goodman  
150 E. Main St., Suite 216  
Fredericksburg, TX 78624-4202

Auerbach Family Dynasty Trust  
50 Lawrence St.  
Lawrence, NY 11559-1436

Cadillac Financial  
P. O. Box 78141  
Phoenix, AZ 85062-8141

Cayenne Goodman  
123 Feather Way  
Fredericksburg, TX 78624-2631

Citicards  
P O Box 6500  
Sioux Falls, SD 57117-6500

Dist Clerk #DC 23-16418  
600 Commerce St. Suite 103  
Dallas, TX 75202-6604

Evalina Pinkasova  
c/o Joseph W. Golinkin, II  
1980 Post Oak Blvd. #2300  
Houston, TX 77056-3841

Freedom Mortgage  
951W. Tamato Rd., #175  
Boca Raton, FL 33431-4444

Genesis Networks Telecom Svc.LLC  
c/o Laurie Rea, Trustee  
300 Throckmorton St. #520  
Ft. Worth, TX 76102-2929

Genesis Networks Telecom Svcs  
c/o Laurie Rea, Trustee  
300 Throckmorton St. #520  
Ft. Worth, TX 76102-2929

Goodman Investment Holdings, LLC  
1354 N Loop 1604 # #103  
San Antonio, TX 78232-1342

Goodman Networks, Inc.  
c/o Davor Rukavina  
500 N.Akard #3800  
Dallas, TX 75201-6659

Goodman Networks, Inc.  
c/o Scott Seidel, Trustee  
6505 W. Park Blvd. #306  
Plano, TX 75093-6212

Gordon Green/Woodforest NatBk  
1717 N. Main St. #3000  
Dallas, TX 75201-4335

Greater Tech Holdings, Inc.  
c/o Janet Casciato-Nortrup  
1201 Louisiana #2800  
Houston, TX 77002-5607

Greater Tech Holdings, Inc..  
P. O. Box 2371  
Fredericksburg, TX 78624-1921

HSB Holdings, LLC  
c/o Paul T. Elkins  
100 Throckmorton St. #1500  
Ft. Worth, TX 76102-2845

Haynes & Boone  
2801 N. Harwood St. #2300  
Dallas, TX 75201-2754

Hudson Clean Energy Ent. LLC  
c/o Michael Cancienne  
1980 Post Oak #2300  
Houston, TX 77056-3841

(p)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Internal Revenue Service  
Special Procedures Insolv.Sec.  
P.O. Box 7346  
Philadelphia, PA 19101-7346

JPMCB Card Services  
P O Box 15353  
Wilmington, DE 19850

(p)JPMORGAN CHASE BANK N A  
BANKRUPTCY MAIL INTAKE TEAM  
700 KANSAS LANE FLOOR 01  
MONROE LA 71203-4774

Jake Goodman  
c/o Anna K. MacFarlane  
2161 NW Military Hwy #400  
San Antonio, TX 78213-1844

James Frinzi  
c/o Paul T. Elkins  
100 Throckmorton St. #1500  
Ft. Worth, TX 76102-2845

James Goodman, Jr.  
c/o Anna K McFarlane  
2161 NW Military Hwy #400  
San Antonio, TX 78213-1844

James Roeder, Individ. & as Trustee  
EquityTrstCo./J.O.RoederRoth IRA  
c/o C. Dixon Mosty  
222 Sidney Baker South #400  
Kerrville, TX 78028-5983

Janet Casciato-Northrup, Trustee  
Greater Tech Holdings, Inc.  
1201 Louisiana #2800  
Houston, TX 77002-5607

Jonathan Goodman  
c/o Anna K. MacFarlane  
2161NW Military Hwy #400  
San Antonio, TX 78213

Judith Auerbach  
50 Lawrence Ave.  
Lawrence, NY 11559-1436

MBG Holdings, Inc.  
4301 Westbank Dr. B 100  
Austin, TX 78746-6564

Mark Castillo  
901 Main St. #5500  
Dallas, TX 75202-3767

Mark Petrocchi  
2200 Forest Park Blvd.  
Ft. Worth, TX 76110-1732

Micah McKinney, Trustee  
Michah McKinney Trust  
c/o C. Dixon Mosty  
222 Sidney Baker South #400  
Kerrville, TX 78028-5983

Neil Auerbach  
c/o Michael Cancienne  
1980 Post Oak #2300  
Houston, TX 77056-3841

Prosperity Bancshares, Inc.  
4295 San Felipe  
Houston, TX 77027-2942

Prosperity Bank  
1301 N. Mechanic St.  
El Campo, TX 77437-2633

Randy Bennett  
421 Compton Ave.  
Irving, TX 75061-6210

S. Dylan Pearcy  
503 Ave. A #1119  
San Antonio, TX 78215-1272

SDLA Courier Services, Inc.  
1865 West 222nd St. #B  
Torrance, CA 90501-3622

Shalom Auerbach  
c/o Michael Cancienne  
1980 Post Oak #2300  
Houston, TX 77056-3841

Steven Zakharyayev  
c/o Joseph W. Golinkin, II  
1980 Post Oak Blvd. #2300  
Houston, TX 77056-3841

The Auerbach Children's Dynasty  
Trust  
50 Lawrence St.  
Lawrence, NY 11559-1436

(p)U S BANK  
4801 FREDERICA STREET  
OWENSBORO KY 42301-7441

Unified Field Services, Inc.  
c/o Anna K. MacFarlane  
2161 N.W. Military Hwy #400  
San Antonio, TX 78213-1844

United States Trustee - AU12  
United States Trustee  
903 San Jacinto Blvd, Suite 230  
Austin, TX 78701-2450

Vista Bank  
c/o Murray Bristol  
10440 N. Central Expressway #800  
Dallas, TX 75231-2264

Whitaker Chalk Swindle & Schwartz  
301 Commerce St. #3500  
Ft. Worth, TX 76102-4135

Woodforest National Bank  
P. O. Box 7889  
The Woodlands, TX 77387-7889

John Andrew Goodman  
1008 Middle Creek Road  
Fredericksburg, TX 78624-7009

John Patrick Lowe  
2402 East Main Street  
Uvalde, TX 78801-4943

Martin Seidler  
Law Offices of Martin Seidler  
11107 Wurzbach, Suite 504  
One Elm Place  
San Antonio, TX 78230

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

FIA/Bank of America  
Bankruptcy Dept. NC4-105-03-14  
4161 Piedmont Parkway  
Greensboro, NC 27410

Internal Revenue Service  
Attn: District Counsel  
300 E. 8th Street  
Austin, TX 78701

(d) Internal Revenue Service  
Attn: Special Procedures Group  
300 E. 8th St., STOP 5022 AUS  
Austin, TX 78701

JPMCB Card Services  
P O Box 15369  
Wilmington, DE 19850

US Bank Home Mortgage  
2800 Tamarack Rd.  
Owensboro, KY 42301

End of Label Matrix  
Mailable recipients 72  
Bypassed recipients 0  
Total 72